



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 18 2001

REPLY TO THE ATTENTION OF

C-14J

Chemical Recovery Systems, Inc.  
Attn: Peter Shagena  
47214 Woodward Avenue, Suite A  
Bloomfield Hills, MI 48034-5061

U.S. EPA has obtained records kept by the Chemical Recovery Systems (CRS) facility in Elyria, Ohio. These records document some of the activity at the CRS site during the period when the CRS company was actively engaged in solvent recovery, bringing spent solvents to the site, operating distillation processes in an attempt to clean the dirty solvents, and selling reclaimed solvent. In addition, some of the records obtained document activities at the site during the period when the Obitts Chemical company, predecessor of CRS at the site, was engaged in similar activities.

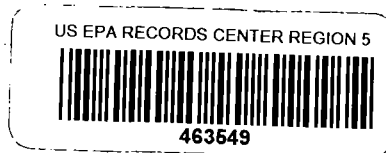
U.S. EPA is enclosing with this letter copies of documents found in these records (e.g., "dirty inventory" lists, entries from accounts receivable and accounts payable ledgers and from "purchase/payment journals;" some of these entries may, for some companies, refer to "drum charges" and "sludge disposal" charges) which name your company or an entity for whose liability U.S. EPA believes your company may be responsible.

U.S. EPA will be hosting a meeting in Chicago for the representatives of the potentially responsible parties (PRPs) identified by U.S. EPA for the CRS Site. This meeting is being tentatively scheduled for Wednesday, June 27.<sup>th</sup> The primary purpose of the meeting is to encourage and facilitate negotiations for an administrative Order on Consent to guide the parties in conducting a remedial investigation/feasibility study of the site.

U.S. EPA has been providing information on the site to the PRPs as quickly as possible. U.S. EPA will continue to provide additional information as it becomes available to assist you in making decisions. U.S. EPA intends that site investigations will begin as soon as possible; therefore, U.S. EPA is establishing a target for execution of a Consent Order by no later than September 30, 2001.

Sincerely,

Thomas C. Nash







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

March 2, 2001

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Chemical Recovery Systems, Inc.  
Attn: Peter Shagena  
47214 Woodward Avenue, Suite A  
Bloomfield Hills, MI 48034-5061

RE: The Chemical Recovery Systems Site, Elyria, Ohio  
General Notice of Potential Liability and  
Request for Information

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced facility (Site), and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, 42 U.S.C. §9607(a), where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

To address the dangers and threats to human health and the environment as quickly as possible, U.S. EPA is currently planning to conduct a Remedial Investigation/Feasibility Study (RI/FS) at the above referenced facility.

The primary objective of the RI/FS is to gather sufficient data to support the selection of the site remedy that will reduce or eliminate risk associated with the contamination at the Site.

The Remedial Investigation (RI) involves:

- Characterizing the nature and extent of the risks associated with the contamination in the site soils, sediment, surface water, and groundwater;
- Determining the potential for contaminant transport via air, groundwater, and sediment/surface water pathways;
- Conducting a baseline public health evaluation and an ecological risk assessment; and
- Conducting treatability studies to evaluate the performance and cost of the treatment technologies and to support the design of the selected remedies.

The RI must include waste characterization, geophysical surveys, excavation of test pits, soil sampling and analysis, groundwater sampling and analysis, and the determination of the Site's geologic and hydrogeologic characteristics.

The primary objective of the Feasibility Study (FS) is to develop, analyze, and compare a range of remedial action alternatives through the application of the nine established evaluation criteria. The FS is comprised of two main phases:

- Development and screening of alternatives; and
- Detailed analysis of the alternatives.

The data collected in the RI influences the development of the remedial action alternatives in the FS, which in turn affects the data needs and scope of the treatability studies and subsequent field studies.

Prior to the start of any of these activities, the following plans will have to be developed and approved by the U. S. EPA:

- Site work plan;
- Site health and safety plan;
- Site security plan;

- Site sampling and analysis plan for the Toxic Compound List/ Toxic Analyte List and Toxicity Characteristic Leaching Procedures parameters;
- Site Quality Assurance Project Plan;
- Site Community Relations Plan.

For additional information regarding the policy and guidance associated with conducting RI/FS studies see OSWER Directive (9355.3-01) Guidance for Conducting Remedial Investigations and Feasibility Studies (RI/FS) Under CERCLA, October 1988.

U.S. EPA has received information that you may have owned or operated or generated or transported hazardous substances that were disposed of at the Site. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site. U.S. EPA is willing to discuss with you the entry of an appropriate administrative consent order under which you would perform or finance response activities and reimburse U.S. EPA for its costs. If a consent order cannot be promptly concluded, U.S. EPA may issue a unilateral order under Section 106 of CERCLA, requiring you to perform specified work. Under Sections 106 and 107 of CERCLA, you may be liable for reimbursement of U.S. EPA's costs, for statutory penalties, and for treble damages for noncompliance with such an order.

Attachment 8 is a list of the names and addresses of any other potentially responsible parties (PRPs) to whom this notification is being sent. This list is provided to assist you in contacting other PRPs in this matter and to negotiate with U.S. EPA.

Enclosed is a U.S. EPA Small Business Regulatory Enforcement Fairness Act Information Sheet (Attachment 7). The information sheet may be helpful, if you are subject to enforcement action by U.S. EPA and you are a qualified small business.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days of receipt of this letter of your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you do not wish to negotiate a resolution of your potential responsibility in connection with the Site and that you have declined any involvement in performing the response activities.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action, or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

In addition, U.S. EPA is seeking to obtain certain other information from you pursuant to its authority under Section 104(e) of CERCLA, 42 U.S.C. §9604(e), for the purpose of enforcing CERCLA and to assist in determining the need for response to a release of hazardous substance(s) under CERCLA. The Administrator of the U.S. EPA has the authority to require any person who has or may have information relevant to any of the following to furnish U.S. EPA with such information: (1) the identification, nature, or quantity of materials which have been or are generated, treated, stored or disposed of at, or transported to, a facility; (2) the nature or extent of a release or threatened release of a hazardous substance, pollutant or contaminant at or from a facility; and (3) the ability of a person to pay for or perform a cleanup. Attachment 1 is a summary of the history of the Chemical Recovery Systems Site.

Pursuant to Section 104(e) of CERCLA, you are hereby requested to submit a response to this Information Request and its questions in Attachment 2 concerning the Chemical Recovery Systems Site at 142 Locust Street in Elyria, Ohio. Instructions to guide you in the preparation of your response are in Attachment 3. Definitions of the terms used in this Information Request and in the questions are in Attachment 4.

This request is directed to your company, its officers, directors, and employees, and its subsidiaries, divisions, facilities and their officers, directors, and employees. The information sought herein must be sent to U.S. EPA within thirty (30) calendar days of your receipt of this letter. Failure to respond fully and truthfully to this request, or to adequately justify any failure to respond, may result in an enforcement action against you by U.S. EPA under Section 104 of CERCLA, as amended.

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may request, however, that any such information be handled as confidential business information. A request for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded this protection by the U.S. EPA. Information claimed as confidential will be handled in accordance with the provisions of 40 C.F.R. Part 2. To request that the Agency treat your information as confidential, you must follow the procedures outlined in Attachment 5, including the requirement that you support your claim for confidentiality.

The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all information contained therein is true and accurate to the best of the signatory's knowledge and belief. Moreover, any documents submitted to U.S. EPA pursuant to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief. Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, the signatory should so notify U.S. EPA. If any answer certified as true should be found to be untrue, the signatory can and may be prosecuted pursuant to 18 U.S.C. §1001. The U.S. EPA has the authority to use the information requested herein in any administrative, civil or criminal action.

This information request is not subject to the approval requirements of the Paperwork Reduction Act, 44 U.S.C. section 3501 et seq.

Send your responses to both the notice of potential liability within ten (10) days and the information requests within thirty (30) days, to:

U.S. Environmental Protection Agency  
Deena Sheppard-Johnson, SR-6J  
Remedial Enforcement Support Section  
77 West Jackson Blvd.  
Chicago, Illinois 60604

If you have any legal questions, please call Thomas Nash, Assistant Regional Counsel, at (312) 353-0552. If you have technical questions about this Site, call Gwendolyn Massenburg, Remedial Project Manager, at (312) 886-0983. Address all other questions to Deena Sheppard-Johnson, Enforcement Specialist, at (312) 886-7048.

Due to the nature of the problem at this Site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frames specified. We trust you will give this matter your immediate attention.

Sincerely,

*Donald J. Bruce*

for James N. Mayka, P.E., Chief  
Remedial Response Branch #2

Enclosures:

Attachments: 1: Site History  
2: Questions  
3: Instructions  
4: Definitions  
5: Confidential Business Information  
6: Legal Authority  
7: Small Business Notice  
8: List of Potentially Responsible Parties (PRPs)



Attachment 1  
SITE HISTORY

The Chemical Recovery Systems Site (CRS Site) is located at 142 Locust Street in Elyria, Ohio. The CRS Site is bordered on the west by the East Branch of the Black River, to the north and east by the Engelhard (formerly Harshaw) Chemical Company, and to the south by M&M Aluminum Siding Company. The CRS Site is located in a predominantly industrial and commercial area near the central business district of Elyria. The CRS Site consists of a four acre parcel that is currently leased to M&M Aluminum which uses the Site property to store aluminum siding. Most of the four acre parcel is empty. Two buildings are currently on the CRS Site: a former warehouse and office building and the masonry shell of a building that housed a Rodney Hunt still. These buildings are located in the southeast corner of the CRS Site. The foundation of a building that housed a Brighton still is located in the northeast corner of the CRS Site. The CRS Site is fenced on all sides except the side bounded by the East Branch of the Black River.

Beginning no later than the 1940s the CRS Site was used for commercial and industrial purposes such as a coal yard. During the 1950s, Harshaw Chemical briefly leased the CRS Site to store saggars. In 1960, Russell Obitts leased the CRS Site property and relocated his existing business, the Obitts Chemical Company, which reclaimed spent organic solvents, to the CRS Site property. Later Russell Obitts and Dorothy Obitts purchased this property.

In 1974, Chemical Recovery Systems, Inc., a Michigan corporation (CRS, Inc., - MI), assumed operations at the CRS Site through a stock purchase agreement with the Obitts Chemical Company. In a separate agreement, CRS, Inc., - MI leased the CRS Site property from Russell Obitts and Dorothy Obitts in a lease agreement with an option to purchase. A year later CRS, Inc., - MI exercised its purchase option. CRS, Inc., - MI continued operations at the CRS Site until 1981.

Operating as Obitts Chemical Company and then as CRS, Inc., - MI the facility located on the Site received spent organic solvents from industrial facilities and reclaimed the solvents through distillation processes. Both owner/operators hauled contaminated solvents to the Site facility in their own tanker trucks and in stake trucks hauling 55 gallon drums. Spent solvents were stored in above ground tanks and 55 gallon drums. Soil contamination

occurred through leakage and spills. Spent solvents that were transported to the CRS Site include, but are not limited to, the following: acetone, hexane, isopropyl alcohol, methylene ethyl ketone (MEK), tetrachloroethane, toluene, trichloroethane, and xylene. Analysis of samples that U.S. Environmental Protection Agency (U.S. EPA) collected on November 26, 1979, at the CRS Site detected PCE, ethyl benzene, and naphthalene. A solvent sample collected on February 5, 1980 contained toluene, ethyl benzene, xylene, and naphthalene. During a visit on February 5, 1980 by U.S. EPA to the CRS Site, an employee of the facility identified specific solvents reclaimed as well as paint solvents.

Because the CRS Site posed imminent danger to the local population and the environment, U.S. EPA initiated an action under the Resource Recovery and Conservation Act (RCRA). On October 7, 1980, the U.S. Department of Justice (U.S. DOJ), on behalf of U.S. EPA, filed an action against CRS, Inc., - MI in the U.S. District Court, Northern District of Ohio, to abate an imminent and substantial endangerment to public health and the environment from the CRS Site. On July 12, 1983, the District Court entered a Consent Decree that required CRS, Inc., - MI to take these and other actions: excavate all visibly contaminated soils identified during a joint U.S. EPA and CRS, Inc., - MI inspection; excavate the perimeter of the Brighton still to a specified depth and distance; dispose of the excavated soil at an approved waste disposal site; backfill the excavated areas; and grade the CRS Site. After its inspection of the CRS Site November 7, 1983, U.S. EPA concluded that CRS, Inc., - MI was in compliance with the July 12, 1983 Consent Decree.

Because hazardous substances released at the CRS-Site remain in the soil and groundwater at elevated levels, U.S. EPA is now taking response actions, under the authority of Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and its amendments.

Attachment 2  
QUESTIONS

1. Identify all persons consulted in the preparation of the answers to these questions.

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions and provide copies of all such documents.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons.

4. List the EPA Identification Numbers of the Respondent.

5. Identify the acts or omissions of any person, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom at the CRS Site.

6. Identify all persons including respondent's employees, who have knowledge or information about the generation, use, treatment, storage, disposal, or other handling of material at or transportation of materials to the Site (operating as Obitts Chemical Company or Chemical Recovery Systems, Inc., at 142 Locust Street, Elyria, Ohio).

7. Describe all arrangements that Respondent may have or may have had with each of the following companies and persons:

- a) Obitts Chemical Company
- b) Russell Obitts
- c) Chemical Recovery Systems, Inc.
- d) Peter Shagena
- e) James Freeman
- f) James "Jim" Jackson
- g) Donald Matthews
- h) Bob Spears
- i) Bill Bromley
- j) Carol Oliver

- k) Nolwood Chemical Company, Inc.
- l) Art McWood
- m) Chuck Nolton
- n) Michigan Recovery System, Inc.
- o) Chemical Recovery Systems of Michigan

8. Set forth the dates during which the Respondent engaged in any of the following activities:

a) generation of hazardous materials which were sent to the CRS Site;

b) transportation of any material to the CRS Site.

9. Identify all persons, including yourself, who may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment, of materials, including, but not limited to, hazardous substances, at the CRS Site. In addition, identify the following:

a) The persons with whom you or such other persons made such arrangements;

b) Every date on which such arrangements took place;

c) For each transaction, the nature of the material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

d) The owner of the materials or hazardous substances so accepted or transported;

e) The quantity of the materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;

f) All tests, analyses, and analytical results concerning the materials;

g) The person(s) who selected the CRS Site as the place to which the materials or hazardous substances were to be transported;

h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;

i) Where the person identified in g., above, intended to have such hazardous substances or materials transported and all evidence of this intent;

j) Whether the materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

k) What was actually done to the materials or hazardous substances once they were brought to the CRS Site;

l) The final disposition of each of the materials or hazardous substances involved in such transactions;

m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the material and hazardous substance involved in each transaction;

n) The type and number of containers in which the materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the CRS Site, and all markings on such containers;

o) The price paid for (i) transport, (ii) disposal, or (iii) both of each material and hazardous substance;

p) All documents containing information responsive to a - o above, or in lieu of identification of all relevant documents, provide copies of all such documents;

q) All persons with knowledge, information, documents responsive to a - p above.

10. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, nonsudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

11. Provide copies of all income tax returns, including all supporting schedules, sent to the Federal Internal Revenue Service in the last five years.

12. If Respondent is a Corporation, respond to the following requests:

a) Provide a copy of the Articles of Incorporation and By-Laws of the Respondent.

b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission.

c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities.

d) Identify the Parent Corporation and all Subsidiaries of the Respondent.

13. If Respondent is a Partnership, respond to the following requests:

a) Provide copies of the Partnership Agreement;

b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission;

c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities.

d) Identify all subsidiaries of the Respondent.

14. If Respondent is a Trust, respond to the following requests:

a) Provide all relevant agreements and documents to support this claim.

b) Provide Respondent's financial statements for the past five fiscal years, including, but not limited to, those filed with the Internal Revenue Service and Securities and Exchange Commission.

c) Identify all of Respondent's current assets and liabilities and the person(s) who currently own(s) or is (are) responsible for such assets and liabilities.

ATTACHMENT 3  
INSTRUCTIONS

1. Answer each of the questions in this Information Request separately.
2. Precede each answer with the number of the question to which it corresponds.
3. In answering each question, identify all persons and contributing sources of information.
4. Although the U.S. EPA seeks your cooperation in this investigation, CERCLA requires that you respond fully and truthfully to this Information Request. False, fictitious, or fraudulent statements or misrepresentations may subject you to civil or criminal penalties under federal law. Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes [the] U.S. EPA to pursue penalties for failure to comply with that Section, or for failure to respond adequately to requests for submissions of required information.
5. In answering each question, identify all persons and contributing sources of information.
6. You must supplement your response to U.S. EPA if, after submission of your response, additional information should later become known or available. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify U.S. EPA as soon as possible.
7. For any document submitted in response to a question, indicate the number of the question to which it responds.
8. You must respond to each question based upon all information and documents in your possession or control, or in the possession or control of your current or former employees, agents, contractors, or attorneys. Information must be furnished regardless of whether or not it is based on your personal knowledge, and regardless of source.

9. Your response must be accompanied by the following statement, or one that is substantially equivalent:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The individual who prepared the response or the responsible corporate official acting on behalf of the corporation must sign and date the statement, affidavit, or certification. Include the corporate official's full title.

10. If any of the requested documents have been transferred to others or have otherwise been disposed of, identify each document, the person to whom it was transferred, describe the circumstances surrounding the transfer or disposition, and state the date of the transfer or disposition.
11. All requested information must be provided notwithstanding its possible characterization as confidential information or trade secrets. If desired, you may assert a business confidentiality claim by means of the procedures described in Attachment 5.



ATTACHMENT 4  
DEFINITIONS

1. As used in this letter, words in the singular also include the plural and words in the masculine gender also include the feminine and vice versa.
2. The term *person* as used herein includes, in the plural as well as the singular, any natural person, firm, contractor, unincorporated association, partnership, corporation, trust or governmental entity, unless the context indicates otherwise.
3. *The Site* referenced in these documents shall mean the Chemical Recovery Systems Site located in Elyria, Ohio.
4. The term *hazardous substance* shall have the same definition as that contained in Section 101(14) of CERCLA, including any mixtures of such hazardous substances with any other substances, including petroleum products.
5. The term, *pollutant* or *contaminant*, shall have the same definition as that contained in Section 101(33) of CERCLA, and includes any mixtures of such pollutants and contaminants with any other substances.
6. The term *release* shall have the same definition as that contained in Section 101(22) of CERCLA, and means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, pollutant, or contaminant.
7. The term *identify* means, with respect to a natural person, to set forth the person's full name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
8. The term *identify* means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership[, etc.]), organization, if any, and a brief description of its business.

9. The term *identify* means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
10. The term *you, yours, or Respondent* shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, predecessors, partners, successors, assigns, subsidiaries and agents.
11. The term *dump* as used herein shall mean an accumulation of refuse and discarded materials and/or a place where such materials are dumped.
12. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R., Part 300 or 40 C.F.R., Part 260-280, in which case, the statutory or regulatory definitions shall apply.

ATTACHMENT 5  
CONFIDENTIAL BUSINESS INFORMATION

You may consider some of the information confidential that the U.S. Environmental Protection Agency (U.S. EPA or Agency) is requesting. You cannot withhold information or records upon that basis. The Regulations at 40 C.F.R. Part 2, Section 200 et seq require that the U.S. EPA affords you the opportunity to substantiate your claim of confidentiality before the Agency makes a final determination on the confidentiality of the information.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent and only by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. (See 41 Federal Register 36902 et seq. (September 1, 1976); 43 Federal Register 4000 et seq. (December 18, 1985).) If no such claim accompanies the information when the U.S. EPA receives it, the information may be made available to the public by the Agency without further notice to you. Please read carefully these cited regulations, together with the standards set forth in Section 104(e)(7) of Comprehensive Environmental Response Compensation Liability Act (CERCLA), because, as stated in Section 104(e)(7)(ii), certain categories of information are not properly the subject of a claim of confidential business information.

If you wish the U.S. EPA to treat the information or record as "confidential", you must advise the U.S. EPA of that fact by following the procedures described below, including the requirement for supporting your claim of confidentiality. To assert a claim of confidentiality, you must specify which portions of the information or documents you consider confidential. Please identify the information or document that you consider confidential by page, paragraph, and sentence. You must make a separate assertion of confidentiality for each response and each document that you consider confidential. Submit the portion of the response that you consider confidential in a separate, sealed envelope. Mark the envelope "confidential", and identify the number of the question to which it is the response.

For each assertion of confidentiality, identify:

1. The period of time for which you request that the Agency consider the information confidential, e.g., until a specific date or until the occurrence of a specific event;
2. The measures that you have taken to guard against disclosure of the information to others;
3. The extent to which the information has already been disclosed to others and the precautions that you have taken to ensure that no further disclosure occurs;
4. Whether the U.S. EPA or another federal agency has made a pertinent determination on the confidentiality of the information or document. If an agency has made such a determination, enclose a copy of that determination;
5. Whether disclosure of the information or document would be likely to result in substantial harmful effects to your competitive position. If you believe such harm would result from any disclosure, explain the nature of the harmful effects, why the harm should be viewed as substantial, and the causal relationship between disclosure and the harmful effect. Include a description of how a competitor would use the information;
6. Whether you assert that the information is voluntarily submitted as defined by 40 C.F.R. 2.201(I). If you make this assertion, explain how the disclosure would tend to lessen the ability of the U.S. EPA to obtain similar information in the future;
7. Any other information that you deem relevant to a determination of confidentiality.

Please note that pursuant to 40 C.F.R. 2.208(e), the burden of substantiating confidentiality rests with you. The U.S. EPA will give little or no weight to conclusory allegations. If you believe that facts and documents necessary to substantiate confidentiality are themselves confidential, please identify them as such so that the U.S. EPA may maintain their confidentiality pursuant to 40 C.F.R. 2.205(c). If you do not identify this information and documents as "confidential", your comments will be available to the public without further notice to you.

ATTACHMENT 6  
DESCRIPTION OF LEGAL AUTHORITY

The federal Superfund law (the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601, et seq. (commonly referred to as CERCLA or Superfund) gives U.S. EPA the authority to, among other things: 1) assess contaminated sites, 2) determine the threats to human health and the environment posed by each site, and, 3) clean up those sites.

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604 (e)(2), U.S. EPA has broad information gathering authority which allows U.S. EPA to require persons to furnish information or documents relating to:

- A. The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at a vessel or facility, or transported to a vessel or facility;
- B. The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility;
- C. The ability to pay the costs of the clean-up.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to each question within this Information Request and within the prescribed time frame can result in an enforcement action by U.S. EPA pursuant to Section 104(e)(5) of CERCLA. This Section also authorizes an enforcement action with similar penalties if the recipient of the Request does not respond and does not justify the failure to respond. Other statutory provisions (18 U.S.C. § 1001) authorize separate penalties if the responses contain false, fictitious or fraudulent statements. The U.S. EPA has the authority to use the information requested in this Information Request in an administrative, civil or criminal action.

## Attachment 7

### Supplemental Information for Small Businesses Subject to an U.S. EPA Enforcement Action

The United States Environmental Protection Agency (EPA) offers small businesses a wide variety of compliance assistance resources and tools designed to assist businesses to comply with federal and state environmental laws. These resources can help businesses understand their obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

#### Websites

EPA offers a great deal of compliance assistance information and materials for small businesses on the following Websites, available through public libraries:

➡ <a href="http://www.epa.gov">www.epa.gov</a>	<i>EPA's Home Page</i>
➡ <a href="http://www.smallbiz-enviroweb.org">www.smallbiz-enviroweb.org</a>	<i>EPA's Small Business Home Page</i>
➡ <a href="http://www.smallbiz-enviroweb.org/state.html">www.smallbiz-enviroweb.org/state.html</a>	<i>List of State Contacts</i>
➡ <a href="http://www.epa.gov/ttn/sbap">www.epa.gov/ttn/sbap</a>	<i>Small Business Assistance Programs</i>
➡ <a href="http://www.epa.gov/oeca/polguid/index.html">www.epa.gov/oeca/polguid/index.html</a>	<i>Enforcement Policy and Guidance</i>
➡ <a href="http://www.epa.gov/oeca/smbusi.html">www.epa.gov/oeca/smbusi.html</a>	<i>Small Business Policy</i>
➡ <a href="http://www.epa.gov/oeca/oc">www.epa.gov/oeca/oc</a>	<i>Compliance Assistance Home Page</i>
➡ <a href="http://www.epa.gov/oeca/ccsmd/commpull.html">www.epa.gov/oeca/ccsmd/commpull.html</a>	<i>Small Businesses and Commercial Services</i>
➡ <a href="http://www.epa.gov/oeca/ccsmd/mun.html">www.epa.gov/oeca/ccsmd/mun.html</a>	<i>Small Communities Policy</i>

#### Hotlines

EPA sponsors approximately 89 hotlines and clearinghouses that provide a free and convenient avenues to obtain assistance with environmental requirements. The Small Business Ombudsman Hotline can provide you with a list of all the hot lines and assist you with determining which hotline will best meet your needs. Key hotlines that may be of interest to you include:

➡ Small Business Ombudsman.....	(800) 368-5888
➡ RCRA/UST/CERCLA Hotline.....	(800) 424-9346
➡ Toxics Substances and Asbestos Information.....	(202) 554-1404
➡ Safe Drinking Water.....	(800) 426-4791
➡ Stratospheric Ozone/CFC Information.....	(800) 296-1996
➡ Clean Air Technical Center.....	(919) 541-0800
➡ Wetlands Hotline.....	(800) 832-7828

#### Compliance Assistance Centers

EPA has established national compliance assistance centers, in partnership with industry, academic institutions, and other federal and state agencies, that provide on line and fax back assistance services in the following sectors heavily populated with small businesses:

- ➡ Metal Finishing ([www.nmfrc.org](http://www.nmfrc.org))
- ➡ Printing (1-888-USPNEAC or [www.pneac.org](http://www.pneac.org))
- ➡ Automotive (1-888-GRN-LINK or [www.ccar-greenlink.org](http://www.ccar-greenlink.org))

- ➡ Agriculture (1-888-663-2155 or [www.epa.gov/oeca/ag](http://www.epa.gov/oeca/ag))
- ➡ Printed Wiring Board Manufacturing ([www.pwbrc.org](http://www.pwbrc.org))
- ➡ The Chemical Industry (Contact: Emily Chow 202-564-7071)
- ➡ The Transportation Industry (<http://www.transource.org>)
- ➡ The Paints and Coatings Center (Contact: Scott Throwe 202-564-7013)
- ➡ Local Governments (Contact: John Dombrowski, 202-564-7036)

#### State Agencies

Many state agencies have established compliance assistance programs that provide on-site as well as other types of assistance. Please contact your local state environmental agency for more information. EPA's Small Business Ombudsman can provide you with State Agency contacts by calling (800)-368-5888.

#### Compliance Incentive Policies

EPA's Small Business Policy and Small Communities Policy are intended to promote environmental compliance among small businesses by providing incentives such as penalty waivers and reductions for participation in compliance assistance programs, and encouraging voluntary disclosure and prompt correction of violations. These policies can not be applied to an enforcement action such as this one that has already been initiated, but are noted for future reference. Contact Karin Leff (202-564-7068) for information on the Small Business Policy and Ken Harmon (202-564-7049) for information on the Small Communities Policy.

In order to improve your understanding of and compliance with environmental regulations and avoid the need for future enforcement actions, we encourage you to take advantage of these tools. *However, please note that any decision to seek compliance assistance at this time does not relieve you of your obligation to answer EPA's administrative complaint in a timely manner, does not create any new rights or defenses, and will not affect EPA's decision to pursue this enforcement action.*

The Small Business and Agriculture Regulatory Enforcement Ombudsman and ten Regional Fairness Boards were established to receive comments from small businesses about federal agency enforcement actions. The Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your SIC designation, number of employees or annual receipts) and wish to comment on federal enforcement and compliance activities, call 1-888-REG-FAIR (1-888-734-3247). *However, participation in this program does not relieve you of your obligation to respond to an EPA request, administrative or civil complaint or other enforcement action in a timely manner nor create any new rights or defenses under law. In order to preserve your legal rights, you must comply with all rules governing the administrative enforcement process. The ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action.*

Dissemination of this information sheet does not constitute an admission or determination by EPA that your business, organization or governmental jurisdiction is a small entity as defined by SBREFA or related provisions nor does it create any new rights or defenses under law.

**Attachment 8**  
**CHEMICAL RECOVERY SYSTEMS**  
**UPDATED PRP ADDRESS LIST**  
**LAST UPDATED 6/13/02**

- |  |   |
|--|---|
| 1. 3 M Corp.<br>Attn.: Brian Davis<br>P.O. Box 33428<br>St. Paul, MN 55133-3428  | 9. Foley and Lardner<br>Attn: Tanya O'Neill<br>777 E Wisconsin Ave.<br>Milwaukee, WI 53202-5367<br>(re: Allis Chalmers)     |
| 2. Smith and Condemi Co., LPA<br>Attn: Bruce Illes<br>1801 East 9 <sup>th</sup> Street, Suite 900<br>Cleveland, OH 44114<br>(re: Adams Automatic Inc.) | 10. US Steel Corporation<br>Attn: Miles Stipanovich<br>600 Grant Street, Room 1500<br>Pittsburgh, PA 15219-2800 (re:Alside) |
| 3. Black McCuskey Souers & Arbaugh<br>Attn: Victor Marsh<br>1000 United Bank Plaza<br>220 Market Avenue South<br>Canton, OH 44702-2116 (re: Adelphia)  | 11. American Colors, Inc.<br>Attn: Jim Sayre<br>1110 Edgewater Drive<br>Sandusky, OH 44870                                  |
| 4. Parker Hannifin<br>Airborne Division<br>Attn: Chris Burich<br>6035 Parkland Blvd<br>Cleveland, OH 44124-4141  | 12. American Greetings Corp.<br>Attn: Michelle Creger<br>One American Road<br>Cleveland, OH 44144-2938                      |
| 5. KOA Speer Electronics<br>f/k/a Airco Speer Electronics<br>Bolivar Drive, PO Box 547<br>Bradford PA 16701  | 13. American Marietta<br>P.O. Box 11176<br>Southport, NC 28461-1176   |
| 6. Akron Rubber Company<br>R. G. Jeter, Registered Agent<br>147 Kenilworth Drive<br>Akron, OH 44313  | 14. Ashland Chemical, Inc.<br>Robin Lampkin-Isabel<br>P.O. Box 2219<br>Columbus, OH 43216 (re: Cleveland, OH)               |
| 7. Allegheny Label Co.<br>1224 Freedom Road<br>Cranberry Township, PA 16066  | 15. Ashland Chemical, Inc.<br>Robin Lampkin-Isabel<br>P.O. Box 2219<br>Columbus, OH 43216 (re: Freedom, PA)                 |
| 8. Chemcentral<br>f/k/a Allegheny Solvents & Chemical<br>P.O. Box 730<br>Bedford Park, IL 60499-0730   | 16. Ashland Chemical, Inc.<br>Robin Lampkin-Isabel<br>P.O. Box 2219<br>Columbus, OH 43216 (re: Dayton, OH)                  |



17. Ashland Chemical, Inc.  
Robin Lampkin-Isabel  
P.O. Box 2219  
Columbus, OH 43216 (re: Akron, OH)
18. Astatic Corp.  
P.O. Box 120  
Conneaut, OH 44030
19. Auto & Industrial Finishes  
Attn: Kevin R. Kehoe  
9070 Marshall Road  
Cranberry Township, PA 16066
20. Squire, Sanders & Dempsey L.L.P.  
Attn: Douglas McWilliams  
4900 Key Tower  
127 Public Square  
Cleveland, OH 44114-1304 (re: Avery Label)
21. Thompson Hine  
Attn: Heidi Goldstein  
3900 Key Center  
127 Public Square  
Cleveland, OH 44114-1291 (re:BF Goodrich)
22. McGregor & Patterson  
Attn: J Russell McGregor  
105 Smithfield Street, Suite 200  
Pittsburgh, PA 15222  
(re: Ball/Ranbar/BBT)
23. Squires Sanders & Dempsey  
Attn: Vincent Atriano  
1300 Huntington Center  
41 South High Street  
Columbus, OH 43215 (re: Barr, Inc.)
24. Basic Packaging Machinery Corp.  
642 Sugar Lane  
Elyria, OH 44035
25. Walton Paint Company  
d/b/a Beaver Paint Company  
Attn: Joseph Walton  
108 Main Street  
Jamestown, PA 16134
26. Thompson Hine  
Attn: Andrew Kolesar  
312 Walnut Street, 14<sup>th</sup> floor  
Cincinnati, OH 45202-4029  
(re: Berenfield Steel Drum)
27. Black McCuskey Souers & Arbaugh  
Attn: Victor Marsh  
1000 United Bank Plaza  
220 Market Avenue South  
Canton, OH 44702-2116 (re: Bison)
28. Vorys, Sater, Seymour and Pease  
Attn: Joe Blasko  
52 East Gay Street  
Columbus, OH 43216-1008  
(re: Borden Chemical)
29. Borg Warner  
Attn: Stephanie Bransfield  
200 South Michigan Avenue  
Chicago, IL 60604
30. Lathrop & Gage  
Attn: Jonathan Haden  
2345 Grand Blvd., Ste 2800  
Kansas City, MO 64108-2612 (re: BFI)
31. Whyte, Hirschboeck & Dudek  
Attn: Jennifer Buzecky  
111 East Wisconsin Ave., Ste 2100  
Milwaukee, WI 53202 (re: Bucyrus Erie)
32. Bud Industries, Inc.  
Attn: Ravi Jain  
P.O. Box 998  
Willoughby, OH 44096

33. Aztec Peroxides, Inc.  
f/k/a Carmac Chemical  
555 Garden Street  
Elyria, OH 44035
34. David B. Graham  
Baker & Hostetler LLP  
1900 East 9th Street  
Cleveland, OH 44114-3485  
(re: Celanese)
35. Checkmate Boats  
3691 State Route 4  
Bucyrus, OH 44820
36. McDermott, Will & Emery  
Attn: Louis Rundio, Jr.  
227 W. Monroe St.  
Chicago, IL 60606 (re: Chemcentral)
37. Doepken Keevican & Weiss, P.C.  
Attn: Terry L. Schnell  
58th Floor, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219-2703 (re: Chemical Dist.)
38. Chemical Recovery Systems, Inc.  
Attn: Peter Shagena  
42714 Woodward Avenue, Suite A  
Bloomfield Hills, MI 48304-5061
39. Waste Management  
f/k/a Chem-Trol Pollution Control Services  
Attn: James Forney  
3970 Heritage Avenue  
Okemos, MI 48864
40. Chemtron Corp.  
Attn: Richard Timm  
35850 Schneider Ct.  
Avon, OH 44011
41. Howard & Howard  
Attn: Gary Peters  
39400 Woodward Avenue, Suite 101  
Bloomfield Hills, MI 48304-5151  
(Re: Chrysler Plastics)
42. DaimlerChrysler Corporation  
f/k/a Chrysler Plastic Products Co.  
Attn: Kathleen Hennessey, CIMS 485-13-62  
1000 Chrysler Drive  
Auburn Hills, MI 48236-2808
42. Ingersoll-Rand  
Attn: Donna McMahon  
200 Chestnut Ridge Road  
Woodcliff Lake, NJ 07677  
(re: Clark Equipment)
43. Clyde Paint & Supply Co.  
Gerald F. Thomas, Registered Agent  
301 Lisa Ann Drive  
Huron, OH 44839
44. Cytec Industries, Inc.  
Attn: Thomas Waldman  
Five Garret Mtn Plaza  
West Paterson, NJ 07424  
(re: Conap, Inc.)
45. Conneaut Leather, Inc.  
Attn: Howard Bartow  
4114 Carpenter Road  
Ashtabula, OH 44004
46. Dwyer, Kinburn, Hall & Golub  
Attn: Terrence Dwyer  
16 Furler Street  
Totowa, NJ 07511-0437  
(re: Continental Can/Kiewit)
- Crown Cork & Seal  
f/k/a Continental Can  
Attn: William Gallagher  
One Crown Way  
Philadelphia, PA 19154

47. Cuyohoga Chemical Company  
Attn: Paul Moffat  
3470 West 140<sup>th</sup> Street  
Cleveland, OH 44111-2431
48. Thompson Hine  
Attn: Michael Cyphert  
3900 Key Center  
127 Public Square  
Cleveland, OH 44114-1291  
(re: DeSantis Coatings)
49. Baker & Hostetler, LLP  
Attn: Jason Perdion  
3200 National City Center  
1900 East 9<sup>th</sup> Street  
Cleveland, OH 44114-3485  
(re: Dorn Color)
50. Dow Corning Corporation  
Attn: Barbara Rather (#CO1242)  
2200 West Salzburg Road  
Midland, MI 48686-0994
51. E.I. duPont de Nemours  
f/k/a DuPont Chemical  
Attn: Barbara Gravely, D-7083  
1007 Market Street  
Wilmington, DE 19898
52. Duracote Corporation  
Attn: Gerald Donnelly  
350 North Diamond Street  
Ravenna, OH 44266-1209
53. Kovitz Shifrin & Waitzman  
Attn: Richard Hillsberg  
750 Lake Cook Road, Suite 350  
Buffalo Grove IL 60089 (re: Eagle Rubber)
- Alan Plotkin  
18 East 48<sup>th</sup> Street, Floor 18  
New York, NY 10017 (re: Eagle Rubber)
54. Eastman Kodak  
Attn: Elliott Stern  
343 State Street  
Rochester, NY 14650-0217
55. Centria  
f/k/a Elwin G. Smith  
1005 Beaver Grade Road  
Coraopolis, PA 15108
- Frost Brown Todd, LLC  
Attn: Steven Wesloh  
2200 PNC Center  
201 East Fifth Street  
Cincinnati OH 45202  
(Re: EG Smith/AK Steel)
56. Elyria Concrete Step Company  
Attn: Everett Goad  
8015 North Murray Ridge Road  
Elyria, OH 44035
57. Elyria Foundry  
Attn: Samuel Knezevic  
120 Filbert Street  
Elyria, OH 44036
- Chromalloy American Corp.  
f/k/a Elyria Foundry  
120 S Central Ave.  
St Louis, MO 63105
58. Dow Chemical Co.  
f/k/a Essex Chemical-Jamestown Finishes  
Attn: Tracy Goad Walter  
2030 Dow Center  
Midland, MI 48676
59. FBC Chemical Corporation  
Attn: Lad Hudac  
P.O. Box 599  
Mars, PA 16046

60. Squire, Sanders & Dempsey L.L.P  
Attn: Douglas McWilliams  
4900 Key Tower  
127 Public Square  
Cleveland, OH 44114-1304 (re: Avery/Fasson)
61. Joondeph & Bittel  
Attn: Dale Wilson  
50 South Main Street, Suite 700  
Akron, OH 44308 (re: Ferriot Bros)
62. Hanna, Campbell & Powell  
Attn: David Moss  
3737 Embassy Parkway  
P.O. Box 5521  
Akron, OH 44334 (re: Firestone)
- Jones, Day, Reavis & Pogue  
Attn: Heidi Hughes Bumpers  
901 Lakeside Ave.  
Cleveland, OH 44114-1190 (re: Firestone)
63. Mattel, Inc.  
f/k/a Fisher Price Toys  
Attn: Gregg Clark  
333 Continental Blvd.  
El Segundo, CA 90245-5012
- Morrison & Foerster  
Attn: Peter Hsiao  
555 West Fifth Street  
Los Angeles, CA 90013 (re: Fisher Price Toys)
64. Ford Motor Company  
Attn: Kathy Hofer  
Parklane Towers West Ste 1500  
Three Parklane Blvd.  
Dearborn, MI 48126-2568
65. Foseco, Inc.  
Attn: Frank Simcic  
20200 Sheldon Road  
Cleveland, OH 44142 (re: Brookpark)
66. Foseco, Inc.  
Attn: Frank Simcic  
20200 Sheldon Road  
Cleveland, OH 44142 (re: Conneaut)
67. Vorys, Sater, Seymour and Pease  
Attn: Martyn Brodnik  
52 East Gay Street  
P.O. Box 1008  
Columbus, OH 43216-1008  
(re: Franklin Int'l/Glue)
68. General Electric Company  
Attn: Michael Elder  
320 Great Oaks Office Park, Ste. 323  
Albany, NY 12203
- Young Sommer LLC  
Attn: Dean Sommer  
Five Palisades Drive  
Albany, NY 12205  
(re: General Electric)
69. General Motors  
Attn: Linda Bentley (MC 482-C24-D24)  
300 Renaissance Center  
Detroit, MI 48243 (re: Lordstown)
70. Continental General Tire  
f/k/a General Tire  
Attn: Ralph McCormick  
1800 Continental Blvd.  
Charlotte, NC 28273
71. Glidden Co.  
Attn: Robert Kovalak  
925 Euclid Avenue, Suite 900  
Cleveland, OH 44115
72. Goodyear Tire & Rubber Co.  
Attn: Neal Rountree  
1144 E. Market Street  
Akron, OH 44316

73. Reale & Fossee  
Attn: C.S. Fossee  
625 Stanwix Street, Ste 2405  
Pittsburgh, PA 15222 (re: Gordon Terminal)
74. GLS Corporation  
Attn: Nancy Dehmlow (Great Lakes Terminal)  
P.O. Box 3208  
Arlington Heights, IL 60006-3208
75. Centria  
f/k/a H.H. Robertson  
1005 Beaver Grade Road  
Coraopolis, PA 15108  
  
McDermott, Will & Emery  
Attn: Colleen E. Baime  
227 West Monroe  
Chicago, IL 60606  
(Re: H.H. Robertson)
76. Goldberg, Stinnett, Meyers & Davis  
Attn: Katherine Ray  
44 Montgomery St., Ste 2900  
San Francisco, CA 94104 (re: Hexcel)  
  
Hexcel Corporation  
Attn: A. William Nosil  
11711 Dublin Boulevard  
Dublin, CA 94568  
  
David B. Graham  
Baker & Hostetler LLP  
1900 East 9th Street  
Cleveland, OH 44114-3485  
(re: Hexcel)
77. ITW Food Equipment  
Attn: Steve Adams  
701 S Ridge Avenue  
Troy, OH 45374 (re: Hobart/Grove City)
78. ITW Food Equipment  
Attn: Steve Adams  
701 S Ridge Avenue  
Troy, OH 45374 (re: Hobart/Dayton)
79. Black McCuskey Souers & Arbaugh  
Attn: Victor Marsh  
1000 United Bank Plaza  
220 Market Avenue South  
Canton, OH 44702-2166  
(re: Hoover Company)
80. Calfee, Halter & Griswold LLP  
Attn: Susan Strom  
1400 McDonald Investment Center  
800 Superior Avenue  
Cleveland, OH 44114-2688 (re: Hukill)
81. Henkel Corporation  
f/k/a Dexter Corp./Dexter-Hysol  
Attn: Kevin Chu  
2200 Renaissance Blvd.  
Gulph Mills, PA 19406  
  
Kenneth Arnold  
49 Valley Drive-Suite 200  
Furlong, PA 18925 (re: Henkel/Dexter)  
  
Akzo Nobel Inc.  
Attn: Brian Curtis  
300 South Riverside Plaza, Suite 2200  
Chicago, IL 60606 (re: Dexter Corp.)
82. Industrial Chemical Corp.  
f/k/a Industrial Alkali  
885 W Smith Rd.  
Medina, OH 44256
83. J. C. Whitlam Manufacturing Co.  
Attn: Steve Carey  
P.O. Box 380  
Wadsworth, OH 44282-0380
84. Jamestown Paint & Varnish Co.  
Attn: Joseph Walton  
108 Main Street  
Jamestown, PA 16134

1. The first part of the paper discusses the importance of the study of the history of the United States. It is argued that the study of history is essential for a full understanding of the present and for the development of a sense of national identity.

2. The second part of the paper discusses the role of the federal government in the development of the United States. It is argued that the federal government has played a central role in the development of the country, and that its actions have shaped the nation's history.

3. The third part of the paper discusses the role of the states in the development of the United States. It is argued that the states have played a central role in the development of the country, and that their actions have shaped the nation's history.

4. The fourth part of the paper discusses the role of the people in the development of the United States. It is argued that the people have played a central role in the development of the country, and that their actions have shaped the nation's history.

5. The fifth part of the paper discusses the role of the economy in the development of the United States. It is argued that the economy has played a central role in the development of the country, and that its actions have shaped the nation's history.

6. The sixth part of the paper discusses the role of the culture in the development of the United States. It is argued that the culture has played a central role in the development of the country, and that its actions have shaped the nation's history.

7. The seventh part of the paper discusses the role of the environment in the development of the United States. It is argued that the environment has played a central role in the development of the country, and that its actions have shaped the nation's history.

8. The eighth part of the paper discusses the role of the military in the development of the United States. It is argued that the military has played a central role in the development of the country, and that its actions have shaped the nation's history.

9. The ninth part of the paper discusses the role of the judiciary in the development of the United States. It is argued that the judiciary has played a central role in the development of the country, and that its actions have shaped the nation's history.

10. The tenth part of the paper discusses the role of the education system in the development of the United States. It is argued that the education system has played a central role in the development of the country, and that its actions have shaped the nation's history.

11. The eleventh part of the paper discusses the role of the media in the development of the United States. It is argued that the media has played a central role in the development of the country, and that its actions have shaped the nation's history.

12. The twelfth part of the paper discusses the role of the arts in the development of the United States. It is argued that the arts have played a central role in the development of the country, and that their actions have shaped the nation's history.

13. The thirteenth part of the paper discusses the role of the sciences in the development of the United States. It is argued that the sciences have played a central role in the development of the country, and that their actions have shaped the nation's history.

14. The fourteenth part of the paper discusses the role of the social sciences in the development of the United States. It is argued that the social sciences have played a central role in the development of the country, and that their actions have shaped the nation's history.

15. The fifteenth part of the paper discusses the role of the humanities in the development of the United States. It is argued that the humanities have played a central role in the development of the country, and that their actions have shaped the nation's history.

16. The sixteenth part of the paper discusses the role of the physical sciences in the development of the United States. It is argued that the physical sciences have played a central role in the development of the country, and that their actions have shaped the nation's history.

85. Squire, Sanders & Dempsey  
Attn: David Burchmore  
4900 Key Tower  
127 Public Square  
Cleveland, OH 44114-1304  
(Re: Duramax, Inc./Johnson)
86. Kalcor Coatings Co.  
Attn: Newton Zucker  
37721 Stevens Blvd.  
Willoughby, OH 44094
87. Foley, Hoag & Eliot  
Attn: Monica Conyngham  
One Post Office Square  
Boston, MA 02109  
(Re: Kenner/Hasbro)
88. Shumaker, Loop & Kendrick  
Attn: Jeffrey Fort  
1000 Jackson  
Toledo, OH 43624  
(re: Lake Shore Industries)
89. Liberty Solvents & Chemical Co.  
Attn: Raymond Pasquali  
9429 Ravenna Road  
Twinsburg, OH 44087
90. BASF Corporation  
Attn: Harry Baumgartner  
3000 Continental Drive - North  
Mount Olive NJ 07828  
(re: BASF/Limbacher)
91. Jones, Day, Reavis & Pogue  
Attn: John Rego  
901 Lakeside Ave.  
Cleveland, OH 44114-1190  
(re: Lorain Products)
92. Babst, Calland, Clements & Zominir  
Attn: Michele Gutman  
Two Gateway Center  
Pittsburgh, PA 15222 (re: Luxaire)
- VIACOM Inc.  
Attn: Linda Kelley  
MC745  
11 Stanwix Street  
Pittsburgh, PA 15222-1384 (re: Luxaire)
93. Kahn, Kleinman, Yanowitz & Arnson  
Attn: James Koewler  
1301 East Ninth Street, Suite 2600  
Cleveland, OH 44114-1824  
(re: Mahoning Paint)
94. McMahon, DeGulis, Hoffman & Lombardi  
Attn: Gregory DeGulis  
812 Huron Road, Ste 650  
Canton, OH 44115-1126  
(re: Mameco International)
95. USG  
f/k/a Marlite  
125 South Franklin  
Chicago, IL 60606
96. International Paper Company  
f/k/a Masonite Corporation  
Attn: Mr. Joseph Saab  
Tower II  
6400 Poplar Ave.  
Memphis, TN 38197
97. Miller Studio, Inc  
Attn: John Basiletti  
P.O. Box 997  
New Philadelphia, OH 44663
- Lundgren Goldthorpe & Zumbar  
Attn: Andrew Zumbar  
526 East Main Street  
Alliance, OH 44601-0595  
(re: Miller Studio)
98. Exxon Mobil  
Attn: J Kyle Harris  
601 Jefferson Room 1221  
Houston, TX 77002 (re: Mobil Chemical)

1. The first part of the report  
describes the general situation  
of the country.

2. The second part of the report  
describes the economic situation  
of the country.

3. The third part of the report  
describes the social situation  
of the country.

4. The fourth part of the report  
describes the political situation  
of the country.

5. The fifth part of the report  
describes the cultural situation  
of the country.

6. The sixth part of the report  
describes the military situation  
of the country.

7. The seventh part of the report  
describes the international situation  
of the country.

8. The eighth part of the report  
describes the future prospects  
of the country.

9. The ninth part of the report  
describes the conclusion  
of the report.

10. The tenth part of the report  
describes the appendix  
of the report.

11. The eleventh part of the report  
describes the bibliography  
of the report.

12. The twelfth part of the report  
describes the index  
of the report.

13. The thirteenth part of the report  
describes the list of figures  
of the report.

14. The fourteenth part of the report  
describes the list of tables  
of the report.

15. The fifteenth part of the report  
describes the list of references  
of the report.

16. The sixteenth part of the report  
describes the list of abbreviations  
of the report.

17. The seventeenth part of the report  
describes the list of symbols  
of the report.

18. The eighteenth part of the report  
describes the list of units  
of the report.

19. The nineteenth part of the report  
describes the list of definitions  
of the report.



145. Crompton  
Attn: Jeffrey Bailot/Pamela Missal  
Benson Road  
Middlebury, CT 06749 (re: Uniroyal)
- Michelin NA  
Attn: James Fannin  
P.O. Box 19001  
One Parkway South  
Greenville, SC 29615 (re: Uniroyal)
- Uniroyal Technology Corp.  
f/k/a Uniroyal Plastics  
Attn: Oliver Janney  
2 North Tamiami Trail #900  
Sarasota FL 34236-5568
146. Fulbright & Jaworski  
Attn: Eva Fromm O'Brien  
1301 McKinney, Suite 5100  
Houston, TX 77010  
(re: Universal Cooperatives)
147. Vorys, Sater, Seymour and Pease  
Attn: Joe Blasko  
52 East Gay Street  
Columbus, OH 43216-1008  
(re: Vanguard Paints)
148. Tommy Armour Golf  
f/k/a Victor Comptometer-Golf  
8350 North Lehigh Avenue  
Morton Grove, IL 60053
149. Doepken Keevican & Weiss, P.C.  
Attn: Terry L. Schnell  
58th Floor, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219-2703 (re: W.J. Ruscoe)
150. Whirlpool Corp. - Clyde Division  
Attn: Larry Yinger  
2000 N M-63  
Benton Harbor, MI 49022-2692
151. Whirlpool Corp. - Findlay Division  
Attn: Larry Yinger  
2000 N M-63  
Benton Harbor, MI 49022-2692
152. Buckingham, Doolittle & Burroughs  
Attn: Ralph Amiet  
50 S Main Street  
Akron, OH 44309-1500 (re: Wooster Brush)
153. Yenkin Majestic Paint Corporation  
Attn: Merom Brachman  
1920 Leonard Avenue  
Columbus, OH 43219